

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

**Robertson, Anschutz, Schneid, Crane & Partners, PLLC**  
130 Clinton Road, Suite 202  
Fairfield, NJ 07004  
Telephone Number 973-575-0707  
Attorneys For Secured Creditor

In Re:

**Ricardo Gomez**  
***aka Ricardo Gomez-Sanchez***  
**&**  
**Lidia E. Gomez**  
***aka Lidia E Marte***  
***aka Lidia Esther Gomez***  
***aka Lidia Marte***  
***aka Lidia Esther Marte***  
***aka Lidia Gomez,***  
**Debtors.**

Case No.: **20-22489-MBK**

Chapter: 13

Judge: Michael B. Kaplan

### **NOTICE OF MORTGAGE FORBEARANCE**

The undersigned is the Attorney for Creditor NewRez LLC d/b/a Shellpoint Mortgage Servicing, in this matter. On or about March 16, 2021, the Creditor was advised that the Debtor(s)' mortgage loan ending in 5387 ("subject mortgage loan"), secured by real property described as 66 Texas Rd Monroe, NJ 08831-9655, has been impacted by COVID-19. Pursuant to State and/or Federal guidelines, a forbearance has been offered, the terms of which are as follows:

1. The parties agree to a forbearance period of 450 days and have elected to not tender mortgage payments to Creditor that would come due on the subject mortgage loan starting 03/01/2020 through 5/1/2021.
2. Debtor(s) will resume mortgage payments beginning 6/1/2021 and will be required to cure the delinquency created by the forbearance period ("forbearance arrears").
3. The payment amount currently is \$2,051.30.

4. The Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period or any payments that were due and owing prior to the forbearance period. Creditor does not waive its rights under the terms of the note and mortgage or under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.
5. The Creditor does not waive its rights to seek relief from the automatic stay for reasons other than non-payment of the mortgage, including, but not limited to, a lapse in insurance coverage or payment of property taxes.
6. The Debtor(s) do not waive any rights upon expiration of the forbearance period. Prior to the expiration of the forbearance period, however, the Debtor(s) must take the following affirmative steps to address the status of the subject mortgage loan including, but not limited to: (a) bringing the account post-petition current; (b) requesting extension of the forbearance period; (c) applying for loss mitigation; and/or (d) amending the Chapter 13 Plan.
7. Any objection to this Notice must be filed and served not later than 14 days after the filing of the Notice. The Court may conduct a hearing on the objection.

**This Notice is intended to disclose a temporary forbearance of the Debtor(s)' obligation to remit post-petition payments for the forbearance period. Nothing within this Notice should be construed to alter any rights, duties, or deadlines that are not related to the remittance of post-petition mortgage payments.**

Dated: 8/26/2021

**Robertson, Anschutz, Schneid, Crane &  
Partners, PLLC**

130 Clinton Road, Suite 202

Fairfield, NJ 07004

Telephone Number 973-575-0707

Attorneys For Secured Creditor

By: /s/

By: /s/ Harold N. Kaplan\_\_\_\_\_

Harold N. Kaplan, Esquire

Bar ID: HK0226

Email: hkaplan@raslg.com

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**CERTIFICATION OF SERVICE**

1. I, Harold Kaplan, represent NewRez LLC d/b/a Shellpoint Mortgage Servicing, in this matter.
2. On 8/26/2021, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below: Notice of Mortgage Forbearance.
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: 8/26/2021

Robertson, Anschutz, Schneid, Crane &  
Partners, PLLC  
Attorney for Secured Creditor  
130 Clinton Road, Suite 202  
Fairfield, NJ 07004  
Telephone Number 973-575-0707  
By: /s/ Harold N. Kaplan\_\_\_\_\_  
Harold N. Kaplan, Esquire  
Bar ID: HK0226  
Email: hkaplan@raslg.com

Name and Address of Party Served	Relationship of Party to the	Mode of Service
	Case	
<b>Edward Hanratty</b> Edward Hanratty 80 Court Street Freehold, NJ 07728	Attorney for Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other
		(as authorized by the court*)
<b>Ricardo Gomez</b> 66 Texas Rd Monroe, NJ 08831-9655 & <b>Lidia E. Gomez</b> 66 Texas Rd Monroe, NJ 08831-9655	Debtors	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other
		(as authorized by the court*)
<b>Albert Russo</b> Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650-4853	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other
		(as authorized by the court*)
<b>U.S. Trustee</b> US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other
		(as authorized by the court*)